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June 10, 2020

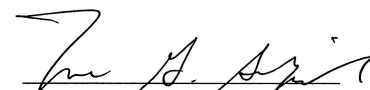
By ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

This extension request is untimely but nevertheless GRANTED. The parties are reminded that, per the Individual Rules, applications for deadline extensions must be filed at least two business days before the deadline. No further extensions absent compelling circumstances. The initial pretrial conference, scheduled for June 25, 2020, is hereby adjourned to **July 16, 2020, at 10:50 a.m.**

Dated: June 11, 2020
New York, New York

Re: *Zurich North American Insurance Company, et al.,*
v. Savino del Bene S.p.A., et al.
1:20-cv-00802-LGS
Our File: 6270


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield,

We represent Plaintiffs in the captioned matter and write to advise the Court that the Parties continue to work conclude and document their agreement in principle for Savino del Bene S.p.A (“SDB Italy”) and Savino del Bene USA, Inc. (“SDB USA”) (collectively “SDB Entities”) to assign their rights against Defendants ASF Intermodal, Inc. (“ASF”) and Containerport Group (“Containerport”) (collectively “ASF Defendants”) to Plaintiffs, with the ASF Defendants’ consent. However, because of certain complications arising from the COVID-19 pandemic, the Parties have not yet been able to do complete that process and, therefore, respectfully request the following interim schedule be ordered:

- (1) Plaintiffs file the Amended Complaint contemplated by the Parties’ anticipated assignment arrangement on or before 1 July 2020;
- (2) All Defendants named in the Amended Complaint answer by or before 15 July 2020;
- (3) The initial conference in this matter scheduled for 25 June 2020 be adjourned to a date to be set by the Court on or after 16 July 2020.

The Parties thank your Honor for considering this joint request.

Kennedy Lillis Schmidt & English

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Respectfully,

KENNEDY LILLIS SCHMIDT & ENGLISH

By: *s/ Nathan T. Williams*

Nathan T. Williams

CC: All Counsel of Record